

EXHIBIT 75

Page 1

1 1 IN THE UNITED STATES DISTRICT COURT
2 2 NORTHERN DISTRICT OF ILLINOIS
3 3 EASTERN DIVISION
4 4 DOROTHY FORTH, DONNA BAILEY,)
5 5 LISA BULLARD, RICARDO)
6 6 GONZALES, CYNTHIA RUSSO,)
7 7 TROY TERMINE, INTERNATIONAL)
8 8 BROTHERHOOD OF ELECTRICAL)
9 9 WORKERS LOCAL 38 HEALTH AND)
10 10 UNION OF OPERATING ENGINEERS)
11 11 LOCAL 295-295C WELFARE FUND,)
12 12 AND STEAMFITTERS FUND LOCAL)
13 13 439, on Behalf of Themselves)
14 14 and All Others Similarly)
15 15 Situated,)
16 16 Plaintiffs,) Civil No.
17 17 vs.) 17-cv-02246
18 18 WALGREEN CO.,)
19 19 Defendant.)
20 20 The videotaped deposition of LISA
21 21 BULLARD, called as a witness for examination,
22 22 taken pursuant to the Federal Rules of Civil
23 23 Procedure of the United States District Courts
24 24 pertaining to the taking of depositions, taken
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Page 2

1 1 before ANDREA L. KIM, a Certified Shorthand
2 2 Reporter of said state, CSR No. 84-3722, at Suite
3 3 3000, 150 South Wacker Drive, Chicago, Illinois,
4 4 on the 7th day of February, A.D. 2019, at 9:30
5 5 a.m.

6 6

7 7 PRESENT:

8 8

9 9 TUSA P.C.,
10 10 (P.O. Box 566,
11 11 Southold, New York 11971
12 12 631-407-5100), by:
13 13 MR. JOSEPH S. TUSA,
14 14 joseph.tusapc@gmail.com,
15 15 -and-
16 16 SCOTT + SCOTT, ATTORNEYS AT LAW, LLP,
17 17 (230 Park Avenue, 17th Floor,
18 18 New York, New York 10169
19 19 212-223-6444), by:
20 20 MR. JOSEPH P. GUGLIELMO,
21 21 jguglielmo@scott-scott.com,
22 22 appeared on behalf of the Plaintiffs;
23 23
24 24

1 1 02536.

2 2 Q. And how long have you lived in
3 3 Massachusetts?

4 4 A. There since 2002. So 17 years.

5 5 Q. Did you live anywhere else during that
6 6 time?

7 7 A. New York City.

8 8 Q. How is that you lived in two places?

9 9 A. I worked in New York City.

10 10 Q. Did you own a place in New York City?

11 11 A. No.

12 12 Q. Did you rent a place in New York City?

13 13 A. I did.

14 14 Q. And where was that?

15 15 A. There were two apartments. One was on
16 16 West 60th Street in New York, and the last one
17 17 was on 89th and Columbus Avenue.

18 18 Q. West 60th, what was the cross street?

19 19 A. Broadway.

20 20 Q. Have you since retired?

21 21 A. Three times, seriously. I am
22 22 officially -- I work as a consultant. I am not
23 23 on payroll. So I am retired.

24 24 Q. We will go through your work history

25

1 1 produced.

2 2 Obviously, because of this, I will
3 3 just reserve our rights if there are additional
4 4 documents that I would need to ask you about that
5 5 I would need to call you back for another
6 6 deposition, but for the meantime, I have no
7 7 further questions.

8 8 MR. TUSA: We have no questions.

9 9 MR. LEIB: Thank you, Ms. Bullard.

10 10 THE VIDEOGRAPHER: This concludes the
11 11 deposition of Lisa Bullard. The time is 3:39.
12 12 End of video three off the record.

13 13 THE COURT REPORTER: Signature, counsel?

14 14 MR. TUSA: We will read and sign.

15 15 THE COURT REPORTER: Mr. Guglielmo, you said
16 16 you wanted a rough?

17 17 MR. GUGLIELMO: Yeah, do you have my info?

18 18 THE COURT REPORTER: Yes.

19 19 (WHEREUPON, the deposition was
20 20 concluded at 3:40 p.m.)

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1 1 CERTIFICATE
2 2 OF
3 3 CERTIFIED SHORTHAND REPORTER
4 4
5 5 I, ANDREA L. KIM, a State of Illinois
6 6 Licensed Certified Shorthand Reporter, License
7 7 number 84-3722, do hereby certify:
8 8 That previous to the commencement of
9 9 the examination of the aforesaid witness, the
10 10 witness was duly sworn or affirmed to testify the
11 11 whole truth concerning the matters herein;
12 12 That the foregoing deposition
13 13 transcript was reported stenographically by me,
14 14 was thereafter reduced to typewriting under my
15 15 personal direction and constitutes a true and
16 16 accurate record of the testimony given and the
17 17 proceedings had at the aforesaid deposition;
18 18 That the said deposition was taken
19 19 before me at the time and place specified;
20 20 That I am not a relative or employee
21 21 or attorney or counsel for any of the parties
22 22 herein, nor a relative or employee of such
23 23 attorney or counsel for any of the parties
24 24

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1 1 hereto, nor am I interested directly or
2 2 indirectly in the outcome of this action.

3 3

4 4 IN WITNESS WHEREOF, I do hereunto set
5 5 my hand and affix my seal of office at Chicago,
6 6 Illinois, this 15th day of February, 2019.

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12 12 ANDREA L. KIM, CSR

13 13 License No. 84-3722.

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